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11 *Attorneys for Plaintiffs Dell Inc. and Dell Products L.P.*

12  
13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)  
17 ANTITRUST LITIGATION

Master File No. 3:07-cv-5944 JST

MDL No. 1917

18 THIS DOCUMENT RELATES TO:

19 Individual Case No. 13-cv-2171 (JST)

20 DELL INC. and DELL PRODUCTS L.P.,

21 Plaintiffs,

22 v.

23 HITACHI, LTD., ET AL.,

24 Defendants.

**STIPULATION AND ~~PROPOSED~~**  
**ORDER REGARDING STAY OF**  
**PROCEEDINGS DUE TO**  
**SETTLEMENT**

1 Plaintiffs Dell Inc. and Dell Products L.P. (collectively, "Dell") and Defendants Samsung  
 2 SDI Co., Ltd., Samsung SDI America, Inc., Samsung SDI (Malaysia) SDN. BHD., Samsung SDI  
 3 Mexico S.A. DE C.V., Samsung SDI Brasil Ltda., Shenzhen Samsung SDI Co., Ltd., and Tianjin  
 4 Samsung SDI Co., Ltd. (collectively, "Samsung SDI") by and through undersigned counsel, hereby  
 stipulate as follows:

5 WHEREAS, Dell commenced an action in the United States District Court for the Western  
 6 District of Texas, which was subsequently transferred to this Court, entitled *Dell Inc. and Dell*  
 7 *Products L.P. v. Hitachi Ltd., et al.*, Case No. 13-cv-2171(JST).

8 WHEREAS, as the parties informed the Court on July 1, 2016, Dell and Samsung SDI have  
 9 reached an agreement in principle to settle Dell's claims in this lawsuit.

10 WHEREAS, following execution of the settlement agreement, Dell will dismiss its claims  
 11 against Samsung SDI pursuant to the terms of that agreement;

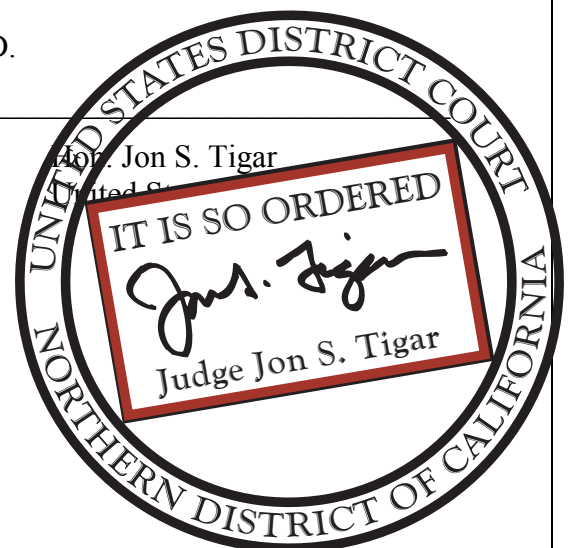
12 WHEREAS, Samsung SDI is Dell's final defendant in this lawsuit, and dismissal of Dell's  
 13 claims against Samsung SDI will conclude Dell's participation in this above-captioned case;

14 IT IS HEREBY STIPULATED AND AGREED by and between counsel for Dell and  
 15 Samsung SDI, subject to the concurrence of the Court, that all remaining proceedings related to  
 16 Dell's claims in the above-captioned litigation should be stayed until the parties file a stipulation  
 17 of dismissal with prejudice. Should the parties fail to finalize the settlement agreement, they will  
 promptly notify the Court so that it may lift the stay.

18 The undersigned parties jointly and respectfully request that the Court enter this Stipulation  
 19 as an order.

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 Dated: July 14, 2016



1 Dated: July 13, 2016

Respectfully Submitted,

2 By: /s/ Michael P. Kenny, Esq.

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26 *Samsung SDI Co., Ltd., and Tianjin Samsung SDI*

27 *Co., Ltd.*

28 .

Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of this document has been obtained from each of the above signatories.